

BEFORE THE
ACUPUNCTURE BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

JONATHAN HWAKAN WU, L.AC.
1718 Colorado Blvd., Ste. 105
Los Angeles, CA 90041
Acupuncturist License No. AC6971

Respondent.

Case No. 1A-2010-189

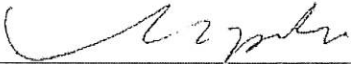
OAH No. 2015030168

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Acupuncture Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on December 9, 2015.

It is so ORDERED November 9, 2015.



FOR THE ACUPUNCTURE BOARD
DEPARTMENT OF CONSUMER AFFAIRS

1 KAMALA D. HARRIS
Attorney General of California
2 E. A. JONES III
Supervising Deputy Attorney General
3 WENDY WIDLUS
Deputy Attorney General
4 State Bar No. 82958
California Department of Justice
5 300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
6 Telephone: (213) 897-2867
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7 E-mail: Wendy.Widlus@doj.ca.gov
Attorneys for Complainant

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10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

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14 **Los Angeles, CA 90041**
Acupuncturist License No. AC6971

OAH No. 2015030168

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

15 Respondent.

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18 **IT IS HEREBY STIPULATED AND AGREED** by and between the parties to the above-
19 entitled proceedings that the following matters are true:

20 **PARTIES**

21 1. Terri Thorfinnson (Complainant) is the Executive Officer of the Acupuncture Board
22 (Board). She brought this action solely in her official capacity and is represented in this matter by
23 Kamala D. Harris, Attorney General of the State of California, by Wendy Widlus, Deputy
24 Attorney General.

25 2. Jonathan Hwakan Wu, L.Ac. (Respondent) is represented in this proceeding by
26 attorney Adam B. Brown, whose address is: 3848 Carson Street, Suite 206
27 Torrance, CA 90503.
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1 must be in addition to any continuing education courses that may be required for license renewal.

2 Within 90 days of the effective date of this decision, Respondent shall submit a plan for the
3 Board's prior approval for meeting the educational requirements. All costs of the coursework
4 shall be borne by the Respondent.

5 2. COST RECOVERY Respondent shall pay to the Board its costs of investigation and
6 enforcement of \$14,469.50 less 20% for a total of \$11,575.60. This amount shall be paid in full,
7 directly to the Board within six (6) months prior to the termination date of probation. Cost
8 recovery will not be tolled. Respondent understands that failure to timely pay costs is a violation
9 of probation, and submission of evidence demonstrating financial hardship does not preclude the
10 Board from pursuing further disciplinary action. However, Respondent understands that
11 providing evidence and supporting documentation of financial hardship may delay further
12 disciplinary action. Consideration to financial hardship will not be given should Respondent
13 violate this term and condition, unless an unexpected AND unavoidable hardship is established
14 from the date of this order to the date payment(s) is due.

15 3. OBEY ALL LAWS Respondent shall obey all federal, state and local laws and all
16 regulations governing the practice of acupuncture in California. A full and detailed account of
17 any and all violations of law shall be reported by the Respondent to the board in writing within
18 seventy-two (72) hours of occurrence.

19 4. QUARTERLY REPORTS Respondent shall submit quarterly declarations under
20 penalty of perjury on forms provided by the Board, stating whether there has been compliance
21 with all the conditions of probation.

22 5. SURVEILLANCE PROGRAM Respondent shall comply with the Board's probation
23 surveillance program and shall, upon reasonable notice, report to the assigned investigative
24 district office. Respondent shall contact the assigned probation surveillance monitor regarding
25 any questions specific to the probation order. Respondent shall not have any unsolicited or
26 unapproved contact with 1) victims or complainants associated with the case; 2) Board members
27 or members of its staff; or 3) persons serving the Board as expert examiners.

28 6. INTERVIEW WITH THE BOARD OR ITS DESIGNEE Respondent shall appear in

1 person for interviews with the Board or its designee upon request at various intervals and with
2 reasonable notice.

3 7. CHANGES OF EMPLOYMENT Respondent shall notify the Board in writing,
4 through the assigned probation surveillance compliance officer of any and all changes of
5 employment, location and address within 30 days of such change.

6 8. TOLLING FOR OUT-OF-STATE PRACTICE OR RESIDENCE In the event
7 Respondent should leave California to reside or to practice outside the State, Respondent must
8 notify the Board in writing of the dates of departure and return. Periods of residency or practice
9 outside California will not apply to the reduction of this probationary period.

10 9. EMPLOYMENT AND SUPERVISION OF TRAINEES Respondent shall not
11 employ or supervise or apply to employ or supervise acupuncture trainees during the course of
12 this probation. Respondent shall terminate any such supervisorial relationship in existence on the
13 effective date of this probation.

14 10. VIOLATION OF PROBATION If Respondent violates probation in any respect, the
15 Board may, after giving Respondent notice and the opportunity to be heard, revoke probation and
16 carry out the disciplinary order that was stayed. If an accusation or petition to revoke probation is
17 filed against Respondent during probation, the Board shall have continuing jurisdiction until the
18 matter is final, and the period of probation shall be extended until the matter is final. No petition
19 for modification or termination of probation shall be considered while there is an accusation or
20 petition to revoke probation pending against Respondent.

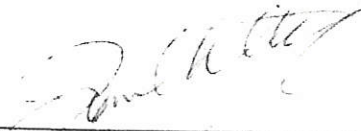
21 11. COMPLETION OF PROBATION Upon successful completion of probation,
22 Respondent's license will be fully restored.

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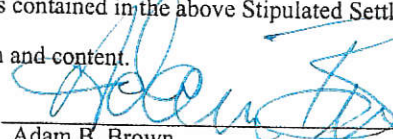
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ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Adam B. Brown. I understand the stipulation and the effect it will have on my Acupuncturist License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Acupuncture Board.

DATED: 8.7.15 
JONATHAN HWAKAN WU, L.A.C.
Respondent

I have read and fully discussed with Respondent JONATHAN HWAKAN WU, L.Ac. the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 8/7/15 
Adam B. Brown
Attorney for Respondent

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Acupuncture Board.

Dated: Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
E. A. JONES III
Supervising Deputy Attorney General

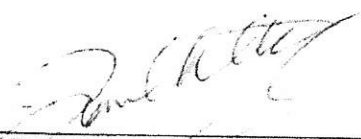
WENDY WIDLUS
Deputy Attorney General
Attorneys for Complainant

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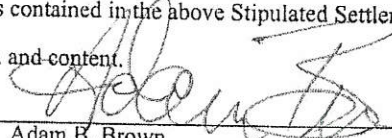
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Respondent

I have read and fully discussed with Respondent JONATHAN HWAKAN WU, L.Ac. the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 8/7/15 
Adam B. Brown
Attorney for Respondent

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Acupuncture Board.

Dated: August 11, 2015 Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
E. A. JONES III
Supervising Deputy Attorney General


WENDY WIDLUS
Deputy Attorney General
Attorneys for Complainant

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